

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

ALONZO GRANT AND STEPHANIE GRANT,

Plaintiffs,

vs.

CITY OF SYRACUSE, SYRACUSE POLICE
DEPARTMENT, POLICE OFFICERS DAMON
LOCKETT AND PAUL MONTALTO, POLICE
OFFICER BRIAN NOVITSKY, CHIEF OF
POLICE FRANK FOWLER, and Does 1-100,

Defendants

CASE NO. 5:15-CV-00445-DNH-TWD

Judge: Honorable DANIEL N. HURD

Date: October 2, 2018

Time: 9:30 AM

Place: Alexander Pirnie Federal
Building & U.S. Courthouse
10 Broad Street
Utica NY. 13501

EXHIBIT LIST

Plaintiff hereby submits the following Exhibits as Plaintiffs Proposed Trial Exhibits

- P-1 Sherrell Grant Affidavit
- P-2 Basic Course for Police Officers: Constitutional Law Part 2, Section A
- P-3 Ethical Awareness, Section 1 Hand Out
- P-4 NY State Domestic incidence Report Reference Manual (DCJS 3221-6/2005)
- P-5 Volume 1, Article 4 – Rules of Conduct, Section 3.00, Use of Physical Force
- P-6 Letter from Frank Fowler to Alonzo Grant dated 7/3/14
- P-7 Syracuse Police Department, Office of Professional Standards, Case Report: 14-93 dated 6/30/2014
- P-8 Photos of Alonzo Grant's Arrest
- P-9 Photos of Alonzo Grant's Injuries

- P-10 Misdemeanor Information: DR#14-344710 – Criminal Court of the City of Syracuse
- P-11 Letter from William J. Fitzpatrick to Charles Bonner dated 11/20/14
- P-12 Letter from Joseph Lipari to Alonzo Grant dated October 16, 2014
- P-13 Character References for Alonzo Grant
- P-14 Medical Records for Alonzo Grant – Upstate University Health System
- P-15 Medical Assessment by John Charles M.D., dated 7/9/2014
- P-16 Article: Syracuse City Councilors to Investigate Police Policy on Use of Force
- P-17 Article: Discipline Recommended in 21 Complaints Against Syracuse Police
- P-18 Syracuse Citizen Review Board, Annual Report, January 1 to December 31, 2012 (recreated)
- P-19 Syracuse Citizen Review Board, Annual Report 2013 (recreated)
- P-20 Syracuse Citizen Review Board, Annual Report 2014
- P-21 Volume 1, Article 4 – Rules of Conduct, Section 1.00, Professional Standards of Conduct & Ethics
- P-22 CNYLEADS Supplemental Report, Incident Complaint Number 14-344710
- P-23 Syracuse police Department, Domestic Incident Report 14-344710
- P-24 Photo: Satellite View of Residence
- P-25 Photo of Front Exterior of Residence 1
- P-26 Photo of Front Exterior of Residence 2
- P-27 Syracuse Police Department Use of Force Report dated 6/29/2014
- P-28 Photo of Exterior Residential Block
- P-29 Photo of Exterior Residential Neighbor Yard
- P-30 Video Testimony of Sharon Hayes
- P-31 Video Testimony of Corey McMullin
- P-32 Subpoena Person Most Knowledgeable dated March 3, 2016
- P-33 Redacted Letter from Joseph Lipari to Frank Fowler dated October 26, 2012
- P-34 Redacted Letter from Joseph Lipari to Frank Fowler dated December 19, 2012
- P-35 Redacted Letter from Joseph Lipari to Frank Fowler dated January 17, 2013

- P-36 Redacted Letter from Joseph Lipari to Frank Fowler dated July 17, 2013
- P-37 Redacted Letter from Joseph Lipari to Frank Fowler dated May 24, 2013, 1
- P-38 Redacted Letter from Joseph Lipari to Frank Fowler dated May 24, 2013, 2
- P-39 Redacted Letter from Joseph Lipari to Frank Fowler dated October 17, 2013
- P-40 Syracuse Citizen Review Board, Case Report: #14-005
- P-41 Syracuse Citizen Review Board, Case Report: #12-059
- P-42 Syracuse Citizen Review Board, Case Report: #13-020 & 13-021
- P-43 Syracuse Citizen Review Board, Case Report: #13-100
- P-44 Letter from Joseph Lipari to Frank Fowler dated December 30, 2013
- P-45 Syracuse Citizen Review Board, Case Report: #13-111
- P-46 Letter from Joseph Lipari to Frank Fowler dated June 27, 2014
- P-47 Syracuse Citizen Review Board, Case Report: #14-018
- P-48 Letter from Joseph Lipari to Frank Fowler dated June 20, 2014
- P-49 Testimony of Alonzo Grant 50 H Hearing
- P-50 Testimony of Stephanie Grant 50 H Hearing
- P-51 Letter from Anil K. Verma MD dated September 22, 2015
- P-52 Letter from John A Charles MD dated July 31, 2014
- P-53 Letter from John A. Charles MD dated August 19, 2014
- P-54 Letter from Anil K. Verma MD dated October 5, 2015
- P-55 Photo: Door Top of Stairs Looking at Front Door
- P-56 Photo: Down Stairs to Front Door
- P-57 Photo: Front Door Gate Closed
- P-58 Photo: Front Door Gate Open
- P-59 Photo: Front Door Looking Up Stairs
- P-60 Photo: Front Door Up Stairs 1
- P-61 Photo: Front Door Up Stairs 2

- P-62 Photo: Gate Chain 1
- P-63 Photo: Gate Chain 2
- P-64 Photo: Stairs to Dining Room
- P-65 Photo: Top of Stairs 1
- P-66 Photo: Top of Stairs 2
- P-67 Photo: Top of Stairs 3
- P-68 Video: Mr. Grant Being Arrested
- P-69 Video: Trisha Goldsmith
- P-70 Video: Sherrell Grant
- P-71 Video: Alonzo Grant 1
- P-72 Video: Alonzo Grant 2
- P-73 Video: Stephanie Grant part 1
- P-74 Video: Stephanie Grant part 2
- P-75 Video: Corey McMullin part 1
- P-76 Video: Corey McMullin part 2
- P-77 Video: Corey McMullin part 3
- P-78 Video: Mr. & Mrs. Grant, part 1
- P-79 Video: Mr. & Mrs. Grant, part 2
- P-80 Video: CNY Central coverage
- P-81 Syracuse Citizen Review Board, Annual Report 2015
- P-82 Medical Lien – Trovers
- P-83 Psychiatric Wellness Care Notes
- P-84 Family Care Medical Group Records
- P-85 Health Statements
- P-86 June 28 2014 Medical Records (3 pages)
- P-87 June 28, 2014 Emergency Dept. Records (14 Pages)

P-88 June 28, 2014 CT Records
P-89 June 28, 2014 Follow-up care instructions
P-90 July 3, 2014 Elbow X-Ray
P-91 July 11, 2014 Orthopedic Note
P-92 July 17, 2014 Eyecare of CNY Charges
P-93 August 24, 2014 MRI
P-94 September 18, 2014 MD. Verma, MD note
P-95 September 26, 2014 -10-15, 2014 Upstate Med Records
P-96 September 30, 2014 Cotter LCSW note
P-97 September 30, 2014 Initial Evaluation
P-98 October 17, 2014 MD Verma MD note
P-99 October 17, 2014 Zoloft Prescription

DATED: **September 18, 2018**

RESPECTFULLY SUBMITTED
LAW OFFICES OF BONNER AND BONNER

By: /s/ CHARLES A. BONNER

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I am over the age of eighteen years, employed in Marin County California. The business address is 475 Gate Five Road, Suite 212, Sausalito, California 94965.

DOCUMENT(S) : EXHIBIT LIST

I caused to be served a true copy of the above-named document(s) per the addressee(s) listed below or per the attached list.

(X) BY ELECTRONIC SERVICE

**KRISTEN SMITH, ESQ.
H. J. HUBERT, ESQ.
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SYRACUSE, NY 13202**

**PAUL J. TUCK, ESQ.
HANCOCK ESTABROOK LLP
100 MADISON STREET, SUITE 1500
SYRACUSE, NY 13202**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Served and executed this 18th day of September, 2018.

/s/Charles A. Bonner
Charles A. Bonner